## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

WILLIAM D. HERRIN,	) Case No. 1:20-cv-01439
Plaintiff,	)
vs.	)
ALLIED SERVICING CORPORATION,	)
Defendant.	) )

## PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT

To: The Clerk of the U.S. District Court for the Northern District of Illinois

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff requests that the Clerk enter default against Defendant, ALLIED SERVICING CORPORATION, for failure to plead or otherwise defend as provided by the Federal Rules of Civil Procedure as appears from the record in this case and the declaration of Rusty A. Payton, Esq., attached hereto.

Dated: March 23, 2020 Respectfully submitted,

/s/ Rusty A. Payton
Rusty A. Payton
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Counsel for Plaintiff

## **CERTIFICATE OF SERVICE**

I, Rusty A. Payton, hereby certify that on March 23, 2020, I caused a copy of the PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT and DECLARATION IN SUPPORT OF MOTION FOR ENTRY OF DEFAULT to be placed in a postage-paid envelope addressed to the Defendant at the address stated below, which is the last known address of said Defendant, and deposited said envelope in the United States mail:

Allied Servicing Corporation Melissa, Bolling, President 3019 N. Argonne Road Spokane Valley, WA 99212 melissa@allservicing.com

Respectfully submitted,

/s/ Rusty A. Payton
Rusty A. Payton